Mark Aker
Aker Plastics Inc.
P.O box 484
Plymouth IN, 46563

Re: **099-12469**
First Administrative Amendment to
Part 70 099-5864-00022

Dear Mark Aker:

Aker Plastics Inc. was issued a permit on July 14, 1999 for Plastics Manufacturing Plant. A letter requesting change of name of responsible official and correcting typographical error was received on July 05, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (with changes shown in Bold and Strikeout method):

1. Change the responsible official to Mark Aker. Section A.1 of the permit is amended as follows:

   Responsible Official: ~~Benny Duvall~~ **Mark Aker**

2. Permittee has also requested to modify the language in condition D.1.1 (2), so as to reflect 35% monomer content in the resin application. IDEM, OAM on review has determined that this condition is no longer included in the permit and is replaced by a new condition. The condition D.1.1 (2) is amended as follows:

   ~~(2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, February 28, 1998, and shall not exceed 32.3% styrene emitted per weight of gel coat applied and 17.7% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.~~

   (2) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
GS
cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Aker Plastics Inc.
1001 North Oak Road
Plymouth, IN 46563

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-5864-00022	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 14, 1999

First Administrative Amendment 099-12469	Pages Affected: 4, 29, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM).The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates

Responsible Official:	Mark Aker
Source Address:	1001 North Oak, Plymouth IN, 46563
Mailing Address:	P.O box 484
SIC Code:	3088
County Location:	Marshall
County Status:	Attainment area for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Four (4) gelcoat booths, identified as EU-12 through EU-15. Utilizing HVLP spray equipment with a maximum capacity of 210 lbs/hr of gelcoat, equipped with dry filters for particulate control and exhausting to stack -7 through stack -10.

(2) Two (2) lamination areas, with eight (8) chop guns identified as EU-4, through EU-11. Utilizing HVLP-F air assisted airless spray guns equipped, with a maximum capacity of 420 lbs/hr each. Using dry filters for over spray control, exhausting to stacks -1 through stack-6.

(3) One (1) tooling gel gun Identified as EU-1, utilizing HVLP equipment, with a maximum capacity of 210 lbs/hr of gelcoat per hour. Using dry filters for particulate control, exhausting to stack -1.

(4) One (1) tooling resin gun identified as EU-2, with a maximum capacity of 420 pounds of resin per hour, exhausting to stack -2 and -stack-3.

(5) One (1) machining operation area operation with six (6) grinders identified as EU-16 through EU-21 with maximum capacity of 3250 lbs/hr, and exhausting to stack -11.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(1) Four (4) gelcoat booths, identified as EU-12 through EU-15. Utilizing HVLP spray equipment with a maximum capacity of 210 lbs/hr of gelcoat, equipped with dry filters for particulate control and exhausting to stack -7 through stack -10.

(2) Two (2) lamination areas, with eight (8) chop guns identified as EU-4, through EU-11. Utilizing HVLP-F air assisted airless spray guns equipped, with a maximum capacity of 420 lbs/hr each. with dry filters for over spray control, exhausting to stacks -1 through stack-6.

(3) One (1) tooling gel gun Identified as EU-1, utilizing HVLP equipment, with a maximum capacity of 210 lbs/hr of gelcoat per hour. Using dry filters for particulate control. Exhausting to stack -1.

(4) One (1) tooling resin gun identified as EU-2, with a maximum capacity of 420 pounds of resin per hour, exhausting to stacks -2 and -stack-3.

(5) One (1) machining operation area operation with six (6) grinders identified as EU-16 through EU-21 with maximum capacity of 3250 lbs/hr, and exhausting to stack -11.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to OP 50-11-92-0128, issued on November 1, 1991 the use of gel coats, resins, clean up solvents and other material containing volatile organic compounds shall be limited such that the potential to emit VOC's shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(2) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

D.1.2 Particulate Matter (PM) [326 IAC 6-3]

a) Pursuant to 326 IAC 6-3-2 the particulate matter (PM) overspay from the fiberglass operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

b) Pursuant to 326 IAC 6-3-2 the PM from the grinding operations, shall not exceed 5.7 pounds per hour when operating at a process weight rate of 3250 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.